

**TRIAL BY JURY
IS DEMANDED**

1



Louise Mensch ✓
@LouiseMensch

"Unhinged British witch" "a textbook succubus"- Russian Insider "The Lizzie Borden of the Internet" - GCHQ (according to Randy Credico)

📍 In Team Treason's Head 🔗 patribotics.blog 📅 Joined January 2009

24K Following **289.3K** Followers

[Follow](#)



Patribotics
@patribotics

"a thinly disguised attempt at passing anti-Russian propaganda off as journalism" - Wikileaks

📍 Manhattan, NY 🔗 archive.fo/fo02B#selectio... 📅 Joined March 2017

2,108 Following **26.4K** Followers

[Follow](#)

2. In this case, Plaintiff seeks money damages for the insult, pain, embarrassment, humiliation, mental suffering, injury to his name and reputation, and loss of business and income caused by Mensch's defamation, tortious and intentional misconduct. Mensch's misconduct cannot be tolerated. She is hurting people. She cannot be allowed to continue to use Twitter as a means to spread her nasty lies. Mensch should be punished for her unlawful actions and a very strong message needs to be sent to prevent others from acting in a similar way.

II. PARTIES

3. Plaintiff, Charles Ganske ("Ganske"), is a citizen of Illinois.

4. Defendant, Mensch, is a citizen of New York. She lives in Manhattan, where she trolls Twitter for targets and unleashes her Twitter bombs. She is married to Peter Mensch, a rock music manager. Mensch has been called a "conspiracy queen" and the "InfoWars of the left". [<https://thinkprogress.org/blue-detectives-collapse-trump-russia-a42a94537bdf/>]. Mensch has a reputation in the community in which she lives and works (*i.e.*, on Twitter and generally in New York) as being very untruthful, *see, e.g.*:

<https://twitter.com/leahmcelrath/status/1073698799254728704>

("This is your periodic reminder that Louise Mensch aka Louise Bagshawe is a con artist, a liar, and does not share your values");

<https://twitter.com/nadinevdVelde/status/1030451176146259968>

("Louise Mensch & Rick Wilson personally vouched for this fraud ... #TeamPatriot are insidious liars deliberately weaponizing frauds to poison the truth & to spread disinformation");

<https://twitter.com/KassandraSeven/status/1012861658732122112>

("Louise Mensch is a pathological liar");

<https://twitter.com/Shoq/status/922097700761489408>

("She's a crank, a liar and a nut. Fortunately, she's blown her cred to pieces ... with rational people");

<https://twitter.com/piersmorgan/status/93408075976945664>

(“Just went toe-to-toe with Louise Mensch on @wolfblitzercnn – I called her a liar, and she refused to repeat the allegations....”).

III. JURIDICTION AND VENUE

5. The United States District Court for the Southern District of New York has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332. The parties are citizens of different States and the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest, costs and fees.

6. Mensch is subject to personal jurisdiction in New York. She lives and transacts business in New York. She engages in continuous and systematic business in New York. She published the false statements at issue in this action in New York. She has minimum contacts with New York such that the exercise of personal jurisdiction over her comports with traditional notions of fair play and substantial justice and is consistent with the Due Process Clause of the United States Constitution.

7. Venue is proper in the United States District Court for the Southern District of New York. A substantial part of the events giving rise to the claims stated in this action occurred in the Southern District of New York.

IV. STATEMENT OF THE FACTS

8. Charles Ganske is thirty-seven (37) years old. He graduated with honors in 2004 from the University of Texas-Austin with a B.A. in Plan II Liberal Arts. Between 2005 and 2007, he worked as an editor and grant writer for the Discovery Institute in Seattle, Washington. As part of his job, he edited a website, www.russiablog.org, wrote press releases, authored op-eds, and assisted in drafting fundraiser letters and grant applications. After working in the securities and insurance

industries for a few years, Ganske returned to journalism. Between March 2011 and March 2016, he was employed as Central Region Broadcast News Editor for the Associated Press (“AP”) in Chicago, Illinois. He covered breaking news for broadcast customers across the AP’s 14-state Central U.S. region; developed engaging content, morning/evening ‘drive time’ daily news items for the territory stretching from Illinois to Texas; prepared the morning drive time items for all AP state lines radio subscribers and smartphone (Google and Apple formats) audio app users; reported on Midwestern issues with global implications, from Keystone XL pipeline controversy to drought conditions and impact on Mississippi River shipping, food prices; coordinated with AP bureaus in Atlanta, New York, Los Angeles, Phoenix, Philadelphia, Washington D.C., London and Moscow regarding news tips and stories of interest to the global wire service; and assisted colleagues in coverage of 2014 Sochi Winter Olympics. Between April 2016 and April 2017, he served the AP as its National Sports Broadcast Editor. In this capacity, he produced content for multimedia projects and broadcast member stations/AP smartphone app users on NCAA athletics, MLB, NFL, NBA, NHL, Major League Soccer/European Champions League and English Premier League exhibition matches in the USA, rugby, PGA/LPGA, Mixed Martial Arts (MMA), horse racing, IndyCar, NHRA, drag racing and NASCAR. Ganske was one of the first AP broadcast editors to work with artificial intelligence content: Minor League baseball coverage created by Automated Insights (“Ai”). Between April 2017 and August 10, 2018, Ganske was the AP’s Social Media/UGC specialist in Chicago. He identified and verified social media video and photo content using Twitter, Facebook, Instagram and other platforms for the AP; geo-located breaking news; gathered and published content directly to Twitter,

Instagram and Facebook in a fast-paced, 24/7 newsroom environment; contacted content rights holders and obtained non-exclusive releases of their video and photos to the AP; analyzed social media trends and identified original sourcing of content for fact checking; and collaborated with colleagues at New York HQ desk, U.S. regional desks, London, Asia, Latin America to investigate and prepare stories for APTN. In his seven-and-one half years with the AP, Ganske received positive evaluations from his colleagues in Chicago and London for his UGC work and dedication to acquiring user generated content with tact and professionalism. Until he was smeared by Mensch, Ganske enjoyed an untarnished reputation in the journalism industry.

9. Mensch is a former member of the U.K. Parliament. She was the editor of a “news” site called “Heat Street” until December 2016, when she parted ways with News Corp. (the owner of “Heat Street”) due to her extreme and excessive use of Twitter. Mensch is now a full-time blogger. Mensch says she “absolutely believes” that Russian intelligence planted Hillary Clinton’s e-mails on Anthony Weiner’s laptop; that Russian President Vladimir Putin had Andrew Breitbart killed to allow for Steve Bannon to ascend at Breitbart; and that a number of journalists, public figures, and Twitter users are “Putinbots,” “Kremlin shills,” or otherwise “agents of Russia” and Vladimir Putin [<https://www.vanityfair.com/news/2017/07/twitter-verification-problem>]. Mensch was one of the propagandists who, for over two years, heavily promoted the now completely debunked Russia collusion hoax. [https://www.breitbart.com/politics/2019/03/22/top-10-propagandists-who-pushed-russia-collusion-hoax/amp/?_twitter_impression=true (“Mensch, a former British parliamentarian, has become a household name among the anti-Trump resistance in the U.S., with her fantastical tweets about ‘sealed indictments’

and grand juries”); <https://twitter.com/jimgeraghty/status/1005126142825848833> (“Look, bitch, I didn’t torch your career by running around shouting about paranoid conspiracy theories like ‘Putin killed Breitbart.’ You did that to yourself. Don’t give me grief because you’ve turned yourself into Alex Jones”)].

10. On July 27, 2018, Mensch turned on Ganske. Mensch used her @patribotics Twitter account to publish the following false and defamatory statements about Ganske. Mensch falsely claimed Ganske had a “public vendetta” against and “personal obsession” with another Twitter user, “@Conspirator0”. Mensch tweeted:



[See, <https://twitter.com/patribotics/status/1022701126901276672?lang=en> (emphasis added)].

11. Mensch's statements about Ganske are false because:

- a. Ganske is not "xenophobic" and his tweet is not "xenophobic";
- b. Ganske never spread Russian bots on any website;
- c. Russiablog.org was never Ganske's "own" website;¹
- d. Ganske had no "vendetta" or "obsession" with anyone.

12. Mensch's statement that Ganske "personally spread Russian bots" falsely implies that Ganske employed deceptive means and used fake accounts ("Russian bots") to spread disinformation online. Mensch's statement falsely implies that Ganske used "your own site" to promote the interests of the Kremlin, Russian security services or Russian oligarchs. Mensch's statement imputes to Ganske – a journalist – dishonesty, deception, bias, unethical behavior, and conduct that violated AP's code of conduct.²

¹ The "site" referred to by Mensch in her tweet is www.russiablog.org. The site belonged to the Seattle, Washington-based Discovery Institute's Real Russia Project, a non-profit organization. As has been publicly known for years, www.russiablog.org was founded in Seattle by Moscow-raised Russian citizen Yuri Yurevich Mamchur ("Mamchur"). Today, Mamchur is a piano, techno and contemporary Christian music producer, entrepreneur and a Vanderbilt University Law School and MBA graduate. He lives in Tennessee. Mensch could have easily verified these facts with a few simple Google searches, including a review of Mamchur's public LinkedIn profile [<https://www.linkedin.com/in/yurimamchur/>], but Mensch chose to ignore the truth.

² The AP's News Values and Principles emphasize that it is a reporters "job – more than ever before – to report the news accurately and honestly ... In the 21st century, that news is transmitted in more ways than ever before – in print, on the air and on the Web, with words, images, graphics, sounds and video. But always and in all media, we insist on the highest standards of integrity and ethical behavior when we gather and deliver the news. That means we abhor inaccuracies, carelessness, bias or distortions. It means we will not knowingly introduce false information into material intended for publication or broadcast". Mensch's statement accused Ganske of violating multiple AP standards. <https://www.ap.org/about/news-values-and-principles/>.

13. Mensch knew that Ganske worked for the AP. On her tweet, she deliberately tagged Ganske's employer, "@AP", and published the tweet to "@APCentral" in order to interfere with and prejudice Ganske in his employment and get Ganske fired.³

14. Mensch is a grifter who trolls Twitter and claims to expose "Russian" influence on and off the platform. Mensch came across the conversation (thread) between Ganske and @Conspirator0, and interjected herself. Mensch knowingly falsified the statement that Ganske "personally spread Russian bots" in order to impugn Ganske's character and associate him with "Russian" intermeddlers and propagandists. Mensch knew that her characterization of Ganske would immediately create reputational risk for the AP. In fact, Mensch has a habit and routine practice of targeting persons with false claims that they are associated with Russians or Chinese. On June 30, 2019, for instance, she fraudulently claimed in a tweet that Michael Coudrey's organization, NewRightUS, was hosted by "Russian and Chinese intelligence architecture". [<https://twitter.com/MichaelCoudrey/status/1145472558524858368>]. Mensch has published hundreds of tweets in which she refers to "Russian bots". These tweets confirm that Mensch believes that "Russian bots" engage in malicious and nefarious action, *see, e.g.*:

<https://twitter.com/LouiseMensch/status/1144089471392124928>
 ("Google Trends shows us 'Trolls for Tulsi' is swamping its algorithm by giving us results proving Russian bots still control searches");

³ Mensch's tweet was instantly published to millions on Twitter, including followers of @patriotics, @LouiseMensch, @AP, and @APCentralRegion.

<https://twitter.com/LouiseMensch/status/930770458840006656>

("UK tweeps should know: Jeremy Corbyn also benefited from Russian propaganda in the General Election and if he knowingly cooperated, he should be arrested, like anybody in #Brexit who knowingly colluded. @ me all you want; I broke Russian bots for Brexit last year");

<https://twitter.com/LouiseMensch/status/930108672608538625>

("My piece of last year that broke the "Russian Bots For Brexit" story included alt-right Russian bots posting in EVERY EU language; examples for Le Pen and Orban <https://archive.is/vwzKn>");

<https://twitter.com/LouiseMensch/status/826107908031123457>

("Russian bots have scripted signatures again. Parliament sucks at allowing this attack on our democracy from Russia");

<https://twitter.com/LouiseMensch/status/1055827583491694592>

("Many Bots are saying that it sucks to be RU, Traitor. Because Russian bots are your favorite, and you're scared of the midterms without enough of them to push your propaganda. You're getting impeached, you know that, right? Democrat House = Rule of Law");

<https://twitter.com/LouiseMensch/status/826813017958539264>

("This is a line pushed by Russian bots, who'd like us to give up. We won't");

<https://twitter.com/LouiseMensch/status/869324899038494720>

("Half Trump's tweets likes etc come from Russian bots. There are 18,000 on this tweet from @Evan_McMullin from actual Americans");

<https://twitter.com/LouiseMensch/status/826111031101575168>

("Attacked by @4Chan and attacked by Fancy Bear = exactly the same thing. Fake Trump petition added to by Russian bots");

<https://twitter.com/LouiseMensch/status/891322012102217728>

("With this in search bar you can see Russian bots, created by AI Watson for Team Jared, in real time #OSINT");

<https://twitter.com/LouiseMensch/status/998967727355301888>

("Rosenstein and Sessions just neutralized Horowitz. On the surface, big win for that Comey-McCabe hater, pushed, as he was, by Russian bots from December 2016. But actually, a huge, huge loss for @realDonaldTrump's last line of defense. The new special prosecutor is now a witness");

<https://twitter.com/LouiseMensch/status/980765077891698689>

("My sources with links to UK intelligence, and these are senior sources, have NEVER MENTIONED Aggregate IQ as being a concern. They know Russian bots and memes targeted and threw #Brexit");

<https://twitter.com/LouiseMensch/status/992161292956979208>

(“A simple twitter search on Horowitz Inspector going back to December 2016 will see Russian bots pushing him from the start; anybody may replicate this”);

<https://twitter.com/LouiseMensch/status/1009897719173808128>

(“@ other people with your bullshit distraction. As @MarkWarner tells us, this hysteria is being fed by Russian bots. And POTUS @counterchekist says the same. Enough. Russia. Russia. Russia”).

Mensch has never used the phrase “Russian bots” in a manner that is not odious or contemptuous. When Mensch associated Ganske with “Russian bots” she intended to state or imply that Ganske was engaged in malicious and nefarious acts using these automated “Russian” computer systems. Prior to publication of her false and defamatory statements, however, Mensch knew that all of Ganske’s work for the Discovery Institute was funded by Americans in the United States.

15. Mensch’s insulting words were particularly offensive to Ganske, as he grew up around the military and is the son and grandson of career U.S. Air Force officer pilots, who served in the Cold War-era Strategic Air Command (SAC) as well as during the Vietnam and Persian Gulf Wars.

16. Ganske notified the AP that he was being subjected to targeted harassment by Mensch. AP’s Social Media director, Eric Carvin, did not suggest to Ganske that he had done anything on Twitter to violate the AP’s Social Media Policy.

17. On August 10, 2018, AP terminated Ganske’s employment because of Mensch’s tweets.

COUNT I – DEFAMATION

18. Plaintiff restates paragraphs 1 through 17 of this Complaint, and incorporates them herein by reference.

19. The law of defamation protects a basic constitutional interest: the individual's right to personal security and the uninterrupted entitlement to enjoyment of his reputation. In *Rosenblatt v. Baer*, Mr. Justice Stewart emphasized that:

“‘Society has a pervasive and strong interest in preventing and redressing attacks upon reputation.’ The right of a man to the protection of his own reputation from unjustified invasion and wrongful hurt reflects no more than our basic concept of the essential dignity and worth of every human being—a concept at the root of any decent system of ordered liberty ... The destruction that defamatory falsehood can bring is, to be sure, often beyond the capacity of the law to redeem. Yet, imperfect though it is, an action for damages is the only hope for vindication or redress the law gives to a man whose reputation has been falsely dishonored ... Surely if the 1950's taught us anything, they taught us that the poisonous atmosphere of the easy lie can infect and degrade a whole society.”

383 U.S. 75, 92-93 (1966); *id.* *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 12 (1990)

(“Good name in man and woman, dear my lord, Is the immediate jewel of their souls. Who steals my purse steals trash; ‘Tis something, nothing; ‘Twas mine, ‘tis his, and has been slave to thousands; But he that filches from me my good name Robs me of that which not enriches him, And makes me poor indeed.”) (quoting WILLIAM SHAKESPEARE, *OTHELLO*, act 3 sc. 3)).⁴

20. Mensch used Twitter to make and publish false factual statements of and concerning Ganske. These statements are detailed verbatim above. Mensch published the false statements without privilege of any kind.

21. The false statements constitute defamation *per se*. The statements accuse and impute to Ganske an unfitness to perform the duties of an office or employment for profit, or the want of integrity in the discharge of the duties of such office or

⁴ Libelous speech is not protected by the First Amendment. *Bose Corp. v. Consumers Union of the United States, Inc.*, 466 U.S. 485, 504 (1984) (cited in *Pendleton v. Newsome*, 290 Va. 162, 173, 772 S.E.2d 759 (2015)); *id.* *United States v. Alvarez*, 132 S. Ct. 2537, 2560 (2012) (“false factual statements possess no First Amendment value.”).

employment. Mensch's false statements also prejudice Ganske in his profession and employment as a journalist.

22. By publishing the tweet, Mensch knew or should have known that her defamatory statements would be republished over and over by third-parties to Ganske's detriment. Republication by both identified followers of @patriotics and @LouiseMensch and other Twitter users was the natural and probable consequence of Mensch's actions and was actually and/or presumptively authorized Mensch. In addition to the original publication of the tweet, Mensch is liable for the republications of the false and defamatory statements by third-parties under the republication rule.

23. Ganske is a private individual. Mensch's false statements have harmed Ganske and his reputation.

24. Mensch made the false statements with actual or constructive knowledge that they were false or with reckless disregard for whether they were false. Mensch acted with actual malice and reckless disregard for the truth for the following reasons:

a. Mensch intentionally fabricated the "Russian bots" story out of whole cloth. She published a preconceived and premeditated narrative that she knew to be false, and intentionally employed a scheme or artifice to defame Ganske.

b. Mensch abandoned any and all journalistic standards in tweeting about Ganske.

c. Mensch relied on sources that she knew to be wholly unreliable.

d. Mensch was in possession of information that demonstrated that their statements about Ganske were false. For instance, Mensch knew that *all* of the funding for www.russiablog.org came from American sources.

e. Mensch targeted Ganske and exhibited an extreme hatred for Ganske.

f. Mensch chose to manufacture and publish false and scandalous statements and use insulting words that were unnecessarily strong and that constitute violent, abusive, hateful, sensational language, disproportionate to the occasion. The words chosen by Mensch evince her ill-will, spite and actual malice.

g. Mensch did not act in good faith because, in the total absence of evidence, she could not have had an honest belief in the truth of their statements about Ganske.

h. Mensch tagged Ganske's employer and reiterated, repeated and continued to republish the false defamatory statements about Ganske out of a desire to hurt him and to permanently stigmatize him.

i. Mensch initiated the defamation in retaliation and reprisal, and went out of her way to publish and then republish false statements about Ganske that Mensch knew were untrue.

j. Mensch refused to correct, retract or apologize.

25. Mensch lacked reasonable grounds for any belief in the truth of her statements, and, at the very least, acted negligently in failing to determine the true facts.

26. As a direct result of Mensch's defamation, Ganske suffered presumed damages and actual damages, including, but not limited to, insult, pain, embarrassment, humiliation, mental suffering, injury to his reputation, loss of income and business, special damages, costs, and other out-of-pocket expenses, in the sum of \$2,000,000 or such greater amount as is determined by the Jury.

COUNT II – TORTIOUS INTERFERENCE

27. Plaintiff restates paragraphs 1 through 26 of this Complaint and incorporates them herein by reference.

28. Ganske had a valid employment contract with the AP.

29. By reason of her “OSINT” research, including her review of Ganske’s Twitter account, @CGanskeAP, Mensch had knowledge of Ganske’s contract and employment.

30. Mensch intentionally interfered with Ganske’s contract, property rights and business expectancies by, *inter alia*, devising, aiding, abetting and actively participating in the scheme to defame and injure Ganske by intentionally lying in the tweet, by fabricating a claim that Ganske had “personally spread Russian bots” on a website, and by retweeting the false and defamatory statements to hundreds of thousands on Twitter. Mensch employed improper methods, actions and practices, including acts that were, *inter alia*, defamatory, unethical, oppressive, over-reaching, fraudulent, hostile, and sharp.

31. As a direct and proximate result of Mensch’s tortious interference with contract, Ganske suffered damage and incurred loss, including, without limitation, loss of income and business, damage to reputation, prestige and standing, court costs, and other damages in the amount of \$2,000,000 or such greater amount as is determined by the Jury.

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Ganske alleges the foregoing based upon personal knowledge, public statements of others, and records in his possession. Ganske believes that substantial additional evidentiary support, which is in the exclusive possession of Mensch and her agents and other third-parties, will exist for the allegations and claims set forth above after a reasonable opportunity for discovery.

Ganske reserves his right to amend this Complaint upon discovery of additional instances of Mensch's wrongdoing.

CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, Plaintiff, Charles Ganske, respectfully requests the Court to enter Judgment against Mensch as follows:

- A. Compensatory damages in the amount of \$2,000,000 or such greater amount as is determined by the Jury;
- B. Punitive damages in the amount of \$500,000 or the maximum amount allowed by law;
- C. Prejudgment interest from July 27, 2018 until the date Judgment is entered at the maximum rate allowed by law;
- D. Postjudgment interest at the maximum rate allowed by law;
- E. Attorney's Fees and Costs;
- F. Such other relief as is just and proper.

TRIAL BY JURY IS DEMANDED

DATED: July 25, 2019

CHARLES GANSKE

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(Application for Admission Pro Hac Vice
To be Filed)